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Attorneys for Defendant GOOGLE LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JOEL SCHWARZ, on behalf of his minor
child B.S., EMILY DUNBAR, on behalf of
her minor child H.D., and MICHAEL
GRIDLEY and ELIZABETH GRIDLEY, on
behalf of their minor children A.G. and Z.G.,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 3:25-cv-03125-RS

**DECLARATION OF SUNITA BALI IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED PURSUANT TO CIVIL
L.R. 3-12**

Judge: Hon. Richard Seeborg

1 I, Sunita Bali, declare as follows:

2 1. I am a partner at the law firm Perkins Coie LLP and one of the attorneys representing
3 Defendant Google LLC (“Google”) in the above-captioned action. I have personal knowledge of
4 the facts set forth in this declaration and am competent to testify to its contents.

5 2. I submit this declaration in support of Google’s Administrative Motion to Consider
6 Whether Cases Should be Related under Civil Local Rules 3-12 and 7-11, which requests that
7 *Schwarz et al v. Google LLC*, No. 25-cv-03125-RS (N.D. Cal.) and *Roe et al. v. Google LLC*, No.
8 3:25-cv-08927-AMO (N.D. Cal.) be deemed related and that *Roe* be reassigned to Judge Seeborg
9 who is presiding over *Schwarz*.

10 3. Before filing this motion, our firm asked Plaintiffs’ counsel, Julie Liddell and
11 Rebecca Peterson, whether Plaintiffs would stipulate to the requested relief. They informed us that
12 Plaintiffs oppose this motion. Accordingly, Google was not able to obtain a stipulation.

13 I declare under penalty of perjury that the foregoing is true and correct.

14 Executed this 19th day of December, 2025 in Oakland, California.

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16 By: /s/ Sunita Bali
17 Sunita Bali
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